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FIDELITY NATIONAL TITLE INSURANCE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE OF
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DEUTSCHE BANK NATIONAL TRUST
COMPANY, as Trustee for SECURITIZED
ASSET BACKED RECEIVABLES LLC
TRUST 2007-BR3, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2007-
BR3.

Plaintiff.

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al..

Defendants.

Case No.: 2:21-cv-00297-JCM-EJY

**STIPULATION AND
ORDER EXTENDING DEFENDANT
FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND [ECF No. 14] AND MOTION
FOR FEES AND COSTS [ECF No. 15]**

(First Request)

Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff Deutsche Bank National Trust Company (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 22, 2021, Deutsche Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-829841-C [ECF No. 1-1];
2. On February 22, 2021, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
3. On March 24, 2021, Deutsche Bank filed a Motion for Remand [ECF No. 14];
4. On March 24, 2021, Deutsche Bank filed a Motion for Costs and Fees [ECF No. 15];
5. Fidelity's deadline to respond to Deutsche Bank's Motion for Remand and Motion for Costs and Fees is currently April 7, 2021;
6. Fidelity's counsel is requesting an extension until Wednesday, April 28, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Fidelity requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Fidelity additional time to respond to the legal arguments set forth in Deutsche Bank's motions;
8. Deutsche Bank does not oppose the requested extension;
9. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Fidelity's deadline to respond to Deutsche Bank's Motion
2 for Remand [ECF No. 14] and Motion for Costs and Fees [ECF No. 15] is hereby extended
3 through and including April 28, 2021.

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5 Dated: April 6, 2021

6 EARLY SULLIVAN WRIGHT
7 GIZER & MCRAE LLP

8 By: /s/-- Sophia S. Lau
9 SCOTT E. GIZER
10 SOPHIA S. LAU
11 Attorneys for Defendant FIDELITY
12 NATIONAL TITLE INSURANCE
13 COMPANY

14

15 Dated: April 6, 2021

16 SINCLAIR BRAUN LLP

17 By: /s/-Kevin S. Sinclair
18 KEVIN S. SINCLAIR
19 Attorneys for Defendant FIDELITY
20 NATIONAL TITLE INSURANCE
21 COMPANY

22

23 Dated: April 6, 2021

24 WRIGHT FINLAY & ZAK, LLP

25 By: /s/-Lindsay D. Robbins
26 LINDSAY D. ROBBINS
27 Attorneys for Plaintiff DEUTSCHE BANK
28 NATIONAL TRUST COMPANY

1 **IT IS SO ORDERED:**

2 Dated: April 14, 2021

3 By: Jeanne C. Mahan
4 UNITED STATES DISTRICT COURT
5 JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ D'Metria Bolden
D'METRIA BOLDEN
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP